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Attorneys for Defendants

15 NGAN VAN LE, INDIVIDUALLY AND AS
16 TRUSTEE FOR THE AD VITAM AUT
17 CULPAM TRUST; JML HOLDINGS, LLC,
18 AND JML SURGICAL CENTER LLC

19 UNITED STATES DISTRICT COURT
20 DISTRICT OF NEVADA

21 JOCELYNE R. UY, an individual; and
22 WESTLEY U. VILLANUEVA, an individual,

23 Plaintiffs,

24 vs.

25 SANDY VAN, an individual; NGAN VAN LE,
26 an individual; SANDY VAN, LLC dba VAN
27 LAW FIRM, a Nevada Domestic Limited
28 Liability Company; VAN AND ASSOCIATES
LAW FIRM, PLLC, a Nevada Professional
Limited Liability Company; JML HOLDINGS,
LLC, a Nevada Domestic Limited-Liability
Company; NGAN VAN LE as Trustee for the AD
VITAM AUT CULPAM TRUST; JML
SURGICAL CENTER, LLC, a Nevada Domestic
Limited-Liability Company; DOES I through X;
and ROE CORPORATIONS 1 through X,
inclusive,

29 Defendants.

Case No. 2:24-cv-00599-GMN-DJA

**STIPULATION AND ORDER
EXTENDING DEADLINE FOR REPLY
TO RESPONSE TO LE DEFENDANTS'
MOTION TO DISMISS**

(FIRST REQUEST)

30 Defendants, Sandy Van, Sandy Van, LLC dba Van Law Firm, and Van and Associates Law
31 Firm, PLLC (collectively, the "Van Defendants"), by and through their counsel; Defendants, Ngan
32 Van Le, JML Holdings, LLC, Ad Vitam Aut Culpam Trust, and JML Surgical Center, LLC

1 (collectively, the “Le Defendants”), by and through their counsel; and Plaintiffs, Jocelyne R. Uy and
2 Westley U. Villanueva (collectively, “Plaintiffs”), by and through their counsel, hereby stipulate and
3 agree as follows:

4 1. On April 17, 2024, the Le Defendants filed a Motion to Dismiss the First Amended
5 Complaint [ECF No. 12] (the “Le 12(b)(6) Motion”);

6 2. On May 1, 2024, Plaintiffs filed a Response [ECF No. 19] to the Le 12(b)(6) Motion;

7 3. The Le Defendants presently have until May 8, 2024, to file a Reply to the Response
8 to the Le 12(b)(6) Motion;

9 4. Due to work-related scheduling conflicts for the Le Defendants’ counsel, including a
10 Fed. R. Civ. P. 12(b)(6) motion to dismiss in a RICO case, a confidential mediation statement in
11 another RICO case, a petition for rehearing in an appeal pending before the Nevada Supreme Court,
12 and extensive written discovery and supplemental disclosure obligations in two state court cases, and
13 based on the number of arguments to be addressed by the Le Defendants in their Reply to Plaintiffs’
14 Response to the Le 12(b)(6) Motion, and as a matter of professional courtesy extended by Plaintiffs’
15 counsel, the Le Defendants shall have until May 17, 2024 to file a Reply to the Response to the Le
16 12(b)(6) Motion; and

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1 5. This is the first request to extend the deadline for filing the Reply to the Response to
2 the Le 12(b)(6) Motion and is made in good faith and not for purposes of delay.

3 Dated this 7th day of May, 2024.

4 BAILEY♦KENNEDY

5 By: /s/ Joshua P. Gilmore

6 DENNIS L. KENNEDY
7 JOSHUA P. GILMORE
8 TAYLER D. BINGHAM

9 *Attorneys for Defendants,*
10 NGAN VAN LE, INDIVIDUALLY AND AS
11 TRUSTEE FOR THE AD VITAM AUT
12 CULPAM TRUST; JML HOLDINGS, LLC,
13 AND JML SURGICAL CENTER LLC

14 Dated this 7th day of May, 2024.

15 WILSON, ELSER, MOSKOWITZ,
16 EDELMAN & DICKER LLP

17 By: /s/Sheri M. Thome

18 SHERI M. THOME (Bar No. 8657)
19 NICHOLAS F. ADAMS (Bar No. 14813)

20 *Attorneys for Defendants,*
21 SANDY VAN, SANDY VAN, LLC DBA
22 VAN LAW FIRM, AND VAN AND
23 ASSOCIATES LAW FIRM, PLLC

24 Dated this 7th day of May, 2024.

25 JEPSEN LAW, PLLC

26 By: /s/ Kendra Jepsen

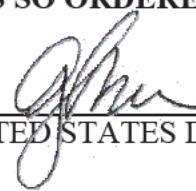
27 KENDRA JEPSEN (Bar No. 14065)

28 - and -

29 SILVIA U. VILLANUEVA (Bar No. 13608)
30 ADLER & VILLANUEVA, LLC

31 *Attorneys for Plaintiffs,*
32 JOCELYN R. UY AND WESTLEY U.
33 VILLANUEVA

34 **IT IS SO ORDERED.**

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36 _____
37 UNITED STATES DISTRICT JUDGE

38 Dated: May 8, 2024